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23 **UNITED STATES DISTRICT COURT**  
24 **DISTRICT OF NEVADA**

25 Betty Williamson,  
26  
27 Plaintiff,

28 vs.

Richland Holdings Inc., dba AcctCorp of  
Southern Nevada, and Law Offices of  
Donna Armenta,  
Defendant.

Case No.: 2:19-cv-01679-RFB-VCF

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND DISCOVERY**  
**SCHEDULE AND PRETRIAL**  
**DEADLINES BY 60 DAYS**

**(SECOND REQUEST)**

1 Plaintiff Betty Williamson (“Plaintiff”) and Defendants Richland Holdings  
2 Inc., dba AcctCorp of Southern Nevada, and Donna Armenta Law, erroneously  
3 named as “Law Offices of Donna Armenta” (collectively, “Defendants,” and with  
4 Plaintiff, the “Parties”), by and through their respective counsel, hereby submit this  
5 stipulation to modify the most recent discovery schedule [ECF Nos. 21, 22] and  
6 extend only the deadlines set forth below by 60 days or until the stay is granted,  
7 whichever comes first.

8 To be clear, the Parties contemplate that if the Court enters an Order on this  
9 Stipulation, the deadlines will be extended as set forth herein. If the District Judge  
10 grants AcctCorp’s Motion to Stay [ECF No. 18] in the interim, then the new deadlines  
11 adopted pursuant to this Stipulation will be stayed as a result. Once the stay is  
12 ultimately lifted, the Parties will, within two weeks therefrom, submit a new joint  
13 proposed discovery plan and scheduling order. If the Motion to Stay is denied, the  
14 Order on this stipulation will govern all remaining deadlines set forth herein.

15 In light of the recent global health pandemic caused by Covid-19 and  
16 Defendants’ pending unopposed motion for stay, the Parties have stipulated to extend  
17 the discovery schedule and extend the pretrial deadlines by 60 days or until the stay  
18 is granted, whichever comes first. When Covid-19 began disrupting businesses,  
19 litigation, and human life, Defendants moved to stay the proceeding in light of the  
20 uncertainty and health crisis. ECF 18. Plaintiff filed a non-opposition on April 8,  
21 2020. ECF 19. As of the date of this stipulation, a ruling on the motion to stay is  
22 still pending.

23 The Parties have agreed to continue dates to avoid the Parties being prejudiced  
24 and to conserve their respective resources, as well as the Court’s time and resources  
25 on this matter, as the Parties await a ruling on the motion to stay. Granting an  
26 extension will not prejudice the Parties, the litigation, or the Court, but in fact the  
27 extensions would avoid prejudice to any of the Parties there is a ruling on the pending  
28 motion.

1        Proposed Schedule

- 2            • the last date to complete discovery from September 22, 2020, to
- 3            **November 23, 2020;**
- 4            • the last date to file dispositive motions from October 22, 2020, to
- 5            **December 21, 2020;**
- 6            • deadline for Defendants to respond to Plaintiff's discovery requests
- 7            from August 11, 2020, to **October 12, 2020;** and
- 8            • the last date to submit pretrial order and pretrial disclosures from
- 9            November 23, 2020 to **January 22, 2021.**

10        Good cause exists to amend the current discovery schedule. The Parties jointly

11        request that this Court modify the discovery schedule pursuant to the Order [ECF No.

12        22] granting the parties first stipulation [ECF No. 21] in order to provide additional

13        time to complete discovery, and in the ordinary course file dispositive motions, and

14        the pretrial documents as described in the proposed timeline above.

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1 This is the second request for an extension of this deadline, and it is sought in  
2 good faith and not for the purposes of delay.

3 DATED this 10th day of August, 2020.

4 **KAZEROUNI LAW GROUP, APC**

5  
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17  
18 **ORDER**

19 IT IS SO ORDERED.

20   
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 8-11-2020  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND DISCOVERY SCHEDULE AND PRETRIAL DEADLINES BY 60 DAYS (SECOND REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 10th day of August, 2020.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

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